

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Zhang,)	
)	
Plaintiff,)	Case No.: 1:24-cv-06834
v.)	
)	Dist. Judge Jeremy C. Daniel
The Individuals, Corporations, Limited)	
Liability Companies, Partnerships, And)	Mag. Judge Sheila M. Finnegan
Unincorporated Associations Identified)	
On Schedule A To The Complaint,)	
Defendants.)	

Unopposed Motion for Extension of Time

NOW COME certain defendants¹ (“Defendants”), by and through their undersigned counsel and hereby request a short extension of time to respond to the Complaint. In support of this, Defendants state as follows:

1. Defendants remain substantively engaged with Plaintiff in settlement discussions including relevant evidence, and demands and offers. Defendants require a short additional time to evaluate settlement, or respond to the Complaint if ultimately necessary. Defendants submit that a short extension will not materially prejudice Plaintiff as a short extension may help avoid unnecessary substantive motion practice.
2. Defendants previously were granted until October 21, 2024 to respond. [Dkt. 74].
3. This Court may, for good cause, extend the time by which a response is due “if a request is made, before the original time or its extension expires.” Fed. R. Civ. P. 6(b)(1)(A). “[U]nder Rule 6(b)(1) as interpreted by case law, the term “good cause” imposes a light burden.” McCann v. Cullinan, 2015 WL 4254226, at * 10 (N.D. Ill 2015), *citing*, 1 Moore’s Federal Practice § 6.06 [2] p. 632 (Matthew Bender 3d ed. 2013); *See also*, Sec. Ins. Co. of Hartford v. Schipporeit, Inc.,

¹ ASPMIZ Direct Store, Alishomtl, Likoyol, Blueangle, DAOXIANG, LLRline, JUMBEAR, LoiFa, ShoPen, Kaltoon, MMstyle, POUKE, ZhoLing, ToLuLu, Artso Shop, Anyshock, USORCHARD

69 F.3d 1377, 1381 (7th Cir. 1995), *citing*, C.K.S. Eng'rs, Inc. v. White Mountain Gypsum Co., 726 F.2d 1202, 1205 (7th Cir. 1984) (“[I]t is the policy of [the Seventh Circuit] to favor trials on the merits over default judgments.”).

4. Defendants respectfully request this Court extend the date on which Defendants are to have filed response(s) to Plaintiff's Complaint, if ultimately necessary, to November 20, 2024.
5. This motion has been filed in good faith and is not interposed for purposes of delay.
6. This is the second motion for an extension of time filed by Defendants in this case.
7. Plaintiff has expressed that it does not oppose Defendants' requested extension.

WHEREFORE, Defendants pray that the Court will enter an order:

- A. extending the time for Defendants to respond to Plaintiff's Complaint, if ultimately necessary, until November 20, 2024.

Dated this October 21, 2024

Respectfully Submitted,

/s/Adam E. Urbanczyk

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